

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

FILED

SEP 14 2021

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

vs.

MARCUS D. WILLIAMS

) UNDER SEAL

) No.

) Violations: Title 21, United States

) Code, Section 841(a)(1) and Title 18,

) United States Code, Section 922(o)

) and 924(c)

SUPERSEDING INDICTMENT

COUNT ONE

The SPECIAL APRIL 2021 GRAND JURY charges:

On or about January 7, 2021, at Rockford, in the Northern District of Illinois,
Western Division,

MARCUS D. WILLIAMS,

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, a mixture and substance containing a detectable amount of 40 grams or more of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWO

The SPECIAL APRIL 2021 GRAND JURY further charges:

On or about January 7, 2021, at Rockford, in the Northern District of Illinois,
Western Division,

MARCUS D. WILLIAMS,

defendant herein, did knowingly possess a machinegun, as defined in Title 18, United States Code, Section 921(a)(23) and Title 26, United States Code, Section 5845(b), namely,

a loaded Glock, model 22, .40 caliber firearm with serial number RBA756 that had been converted into a machinegun by an aftermarket device known as a “glock switch,”

in furtherance of a drug trafficking crime for which defendant may be prosecuted in a court of the United States, namely, possession with intent to distribute 40 grams or more of fentanyl, and possession with intent to distribute a mixture and substance containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count One of this indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(B)(ii).

COUNT THREE

The SPECIAL APRIL 2021 GRAND JURY further charges:

On or about January 7, 2021, at Rockford, in the Northern District of Illinois,
Western Division,

MARCUS D. WILLIAMS,

defendant herein, did knowingly possess a machinegun, as defined in Title 18, United States Code, Section 921(a)(23) and Title 26, United States Code, Section 5845(b), namely, an aftermarket device known as a “glock switch”, a part designed solely and exclusively for the use in converting a weapon into a machinegun;

In violation of Title 18, United States Code, Sections 922(o).

COUNT FOUR

The SPECIAL APRIL 2021 GRAND JURY further charges:

On or about January 7, 2021, at Rockford, in the Northern District of Illinois,
Western Division,

MARCUS D. WILLIAMS,

defendant herein, knowing that he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate and foreign commerce, a firearm, namely a loaded Glock, model 22, .40 caliber firearm with serial number RBA756, which firearm previously had traveled in interstate and foreign commerce;

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The SPECIAL APRIL 2021 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Section 841, as set forth in this Superseding Indictment, defendant shall forfeit to the United States of America any property used, and intended to be used, in any manner and part, to commit and to facilitate commission of the offense, as provided in Title 21, United States Code, Sections 853(a)(2).

2. In addition, defendant shall forfeit to the United States of America any firearm and ammunition:

a. involved in and used in any offense of conviction, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c); and

b. found in the possession and under the immediate control of the defendant at the time of arrest, upon conviction of any offense for committing and attempting to commit any felony involving the use of threats, force, and violence, and perpetrated in whole or in part by the use of firearms, as provided in 18 U.S.C. § 3665.

3. The property to be forfeited includes, but is not limited to, a Glock, model 22, .40 caliber firearm with serial number RBA756 and associated ammunition.

A TRUE BILL:

FOREPERSON


UNITED STATES ATTORNEY